Federal Communications Commission

NPRM&O ：WT Docket 05-235

I feel that the proposal to change Regulation 97 to exclude the need to pass element one, the telegraphy code requirement is a mistake. I believe this for the following reasons:

1. Every group of individuals are who they are because of the culture in which they live. From the very beginning of amateur radio, which is the same as from the very beginning of radio itself, "morse" code has been an intregal part of being an amateur radio operator, part of its tradition and culture. It identifies us both amongst ourselves and to outsiders. If you are a "ham", you know the code. You may not be very good with it or use it often, but you know it and can use it when necessary. Those who have entered the ranks of amateur radio without the need to know the code have a different ethos, a different self-identity, and behave differently. You have only to listen on the ham bands to hear this. It is very "necessary" as a part of amateur radio. If you want more citizen band operators, give them more frequencies. If you want more "hams", keep the code requirement.

2. "Morse" code is a necessity in our society. It is an emergency method of communications even when other means of communication fail. It works with little or no technology. A blunt instrument and something to beat on suffices for a message to be brought through - or a flashlight on a cold mountain. It is recognized as such in the popular culture, witness its continued use in motion pictures for this purpose. If "hams" do not know this code, who will? We are the depository of this knowledge.

3. "Morse" code can be used to get a message through using relatively simple technology in the most adverse of conditions. Any "ham" who can pass the other elements of the exam ought to be able to improvise a simple transmitter and receiver to send code in emergency situations. No computer or complex circuitry is necessary. Further more, Simplicity means that those of modest means can still enjoy the hobby without large investments. I have been an amateur radio operator for over fifty years. I never would have gotten started had I had to invest large amounts of money . This is still true of many in this country as well as throughout the world. Complexity means more parts of the system are liable to failure. At field day and other simulated emergency situations, it is always the computers or some other complex gear that fails, while the code operators keep on operating.

4. "Morse" code, A1A emission, is very efficient use of the spectrum. It requires less band width than most modes while reliably getting the message through. It is argued that other modes require less bandwidth and have error checking. Code will get the message through worse conditions and has the best error checking, the human mind. I have received messages through incredible noise, repeating words over and over, where voice operators would have given up without half the effort and "digital" would have been swamped out by the noisey conditions.

In terms of present day conditions, A1A is much more efficient in terms of real actual use of the high frequency bands today. I have listened on the "digital" sub-bands and the code subbands many times. I *always* hear much more activity on the code portions of the bands, particulaly when conditions are bad. Is it efficient to promote modes that are little used (and that some *hope* will become more popular) and that can only get the message through under ideal conditions, and let die a mode which can reliably get the message through under difficult conditions and which has a large but aging following. If you have no operators who know the code, you have no mode.

5. "Morse" is not impossible to learn. It isn't more difficult than most any other skill. I have taught code classes and had success with student of all ages and abilities. Yes, there are some people who seem never to "get it", but that is just as certain of algebra, basic circuitry or any of the other necessary skills and bodies of knowledge in our hobby.

I sincerely hope that the Commission reconsiders this move. In summary, I don't believe it will attract a body of technically knowledgeable individuals to bulster the public good that hams have always done. I see no evidence that it is not efficient use of the spectrum. And I do not believe that it is in the public interest to rely only on very complex systems of communication in emergency situations.

Sincerely,

John K. Helmbold, K6INM